

# Exhibit B

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
MICHELE A. BAPTISTE,

Plaintiff,

Docket No.: 1:22-cv-02785-JMF

-against-

**NOTICE OF DEPOSITION  
PURSUANT TO  
FED. R. CIV. P. 30(b)(6)**

THE CITY UNIVERSITY OF NEW YORK, and  
VINCENT BOUDREAU, in his individual and official  
capacity,

Defendants.

-----X  
COUNSEL:

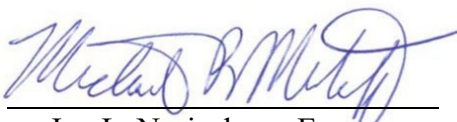
**PLEASE TAKE NOTICE** that pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Plaintiff MICHELE A. BAPTISTE, by and through the undersigned counsel, will take the deposition of Defendant THE CITY UNIVERSITY OF NEW YORK (“CUNY”) on January 15, 2024 at 10:00 a.m., or at a date thereafter based upon agreement of the parties, via videoconference in a virtual setting (i.e., via Zoom, or a reasonably comparable videoconferencing platform), broadcast via the offices of JOSEPH & NORINSBERG, LLC, located at East 59th Street, Suite 2300, New York, N.Y. 10022, or as otherwise agreed to by the parties. The deposition will take place before an officer authorized by law to administer oaths and take testimony and will be recorded by stenographic means, and may be recorded by video and/or audio. The deposition will continue until concluded, and will be used for all lawful purposes.

In accordance with Federal Rule of Civil Procedure 30(b)(6), Defendant CUNY shall designate one or more of its officers, directors, managing agents, or other persons to testify on its behalf, to testify regarding the topics set forth in **Schedule A**. Each person so designated shall testify, under oath, based on matters known or information reasonably available to Defendant CUNY.

Dated: New York, New York  
October 13, 2023

Respectfully,

**JOSEPH & NORINSBERG, LLC**

By:   
Jon L. Norinsberg, Esq.  
Michael R. Minkoff, Esq.  
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*Attorneys for Plaintiff*

**SCHEDULE A**

1. All facts and circumstances regarding the decision to hire Plaintiff;
2. All facts and circumstances regarding anti-discrimination, anti-retaliation, or anti-harassment training offered to, or provided to, or required for Defendant Boudreau and/or anyone else involved in personnel decisions relating to Lynda Dodd, Curtis Rias, and/or Plaintiff, throughout his/their tenure;
3. All facts and circumstances concerning the appointment and removal of Lisa Coico as CUNY President;
4. All facts and circumstances regarding the decision to appoint Boudreau as interim CUNY President;
5. All facts and circumstances regarding the decision to appoint Boudreau as permanent CUNY President;
6. All facts and circumstances regarding the budget allocated to CUNY's department of Diversity & Inclusion, including any changes thereto, for one year prior to Boudreau's appointment as interim President, through two years following the termination of Plaintiff's employment;
7. All facts and circumstances regarding the decision to terminate Plaintiff's employment, including but not limited to any meetings, discussions, or communications after the termination of Plaintiff's employment, wherein the reasons for said termination were discussed, reviewed, or analyzed;
8. All facts and circumstances regarding the search for and eventual hiring of Plaintiff's replacement after her termination, including any subsequent personnel changes to that position/title;
9. All facts and circumstances regarding Defendant Boudreau's role in all disciplinary action taken against Lynda Dodd, including any appeals therefrom;
10. All facts and circumstances regarding Defendant Boudreau's role in responding to any accommodation requests made by Lynda Dodd;
11. All facts and circumstances leading up to, surrounding, and following the June 2015 investigation into Boudreau concerning Lynda Dodd's discrimination and retaliation complaints, specifically including any decisions to issue any discipline against Boudreau, and any changes or implementing of any such decisions;
12. All facts and circumstances regarding the meeting held on or around April 25, 2018 concerning Curtis Rias's accommodation requests;

13. All facts and circumstances regarding Defendant Boudreau's role in responding to any accommodation requests made by Curtis Rias;

14. All facts and circumstances regarding the decision to terminate the employment of Dierdre Hill;

15. All facts and circumstances regarding the decision to terminate the employment of Juana Reina;

16. All facts and circumstances regarding the decision to hire / install Celia Lloyd as an eventual replacement for Juana Reina;

17. All facts and circumstances regarding the creation, implementation, operations, and and dissolution of the President's Council on Inclusiveness / Excellence;

18. All facts and circumstances regarding the Office of Civil Rights investigations during the Presidency of Lisa Coico, arising out of a CUNY graduate student complaint relating to allegations of alleged sexual harassment influencing receipt of a final grade, specifically as it related to Plaintiff's employment;

**CERTIFICATE OF SERVICE**

I, Michael R. Minkoff, Esquire, hereby certify that on this date, October 13, 2023, a true and correct copy of the foregoing *Notice of Deposition* was served via Electronic Mail on the following:

Clement Colucci, Esq.  
Shaina Schwartz, Esq.  
NEW YORK STATE OFFICE OF THE ATTORNEY GENERAL  
Division of State Counsel, Litigation Bureau  
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New York, New York 10005  
Clement.Colucci@ag.ny.gov  
Shaina.Schwartz@ag.ny.gov

By:

  
Michael R. Minkoff, Esq.